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March 15, 2011

Ms. Andrea Needles
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: C00295527
Reply to your February 11, 2011 correspondence concerning CU-PVF's
May Monthly Report covering April 1, 2010 – April 30, 2010

Dear Ms. Needles:

I write in reply to your letter dated February 11, 2011, to Kevin Allen, Treasurer of Citizens United Political Victory Fund ("CU-PVF"), requesting additional information regarding CU-PVF's May 2010 Monthly Report, which covers the period April 1, 2010 through April 30, 2010. More specifically, you state that the report is missing contributor identification information for one or more of the contributions disclosed in Schedule A. But while your letter describes the information that is required to be disclosed, it does not identify any particular information that is missing with respect to any of the contributions disclosed in the report. Nevertheless, you request that CU-PVF either (a) file an amended report providing the unidentified missing information or (b) provide a detailed description of CU-PVF's procedures for complying with the Commission's "best efforts" requirements for obtaining the contributor identifier information required to be disclosed.

I have reviewed Schedule A of the Monthly Report and note that there are two individual donors listed for whom the individual's first name is listed as an initial, and in several instances "Information Requested" is listed as the employer/occupation of a contributor. CU-PVF is in the process of reviewing its records to determine if it has more complete identity information for any of those contributors. If more complete information is available, CU-PVF will file an amended report providing that information.

In the meantime, CU-PVF's treasurer believes that the procedures CU-PVF has established for obtaining and disclosing the identity of its contributors fully complies with the Commission's "best efforts" requirements. Those procedures are as follows:

First, a request for accurate and complete identification is made at the time of the initial solicitation to a prospective contributor. For written solicitations (e.g. direct mail) a response form is included listing the contributor's name and

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